

Debtor 1 Merle Allen Baker, Jr.

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Debtor 2 Trisha Marie Baker  
(Spouse, if filing)United States Bankruptcy Court for the : WESTERN District of Pennsylvania  
(State)Case number 13-10469-TPA**Form 4100R****Response to Notice of Final Cure**

10/15

**According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.****Part 1: Mortgage Information**

**Name of creditor:** U.S. BANK NATIONAL ASSOCIATION, NOT IN  
ITS INDIVIDUAL CAPACITY BUT SOLELY AS TRUSTEE FOR  
MERRILL LYNCH FIRST FRANKLIN MORTGAGE LOAN TRUST,  
MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES  
2007-2

**Court claim no. (if known):** 5-1

**Last 4 digits of any number you use to identify the debtor's account:** 5136

**Property address:** 2040 JACKSON CENTER POLK  
Number                      Street

POLK , PA 16342  
City                      State                      ZIP Code

**Part 2: Prepetition Default Payments****Check one:**

Creditor agrees that the debtor(s) have paid in full amount required to cure the prepetition default on the creditor's claim

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage****Check one:**

Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 6/1/2018  
MM/DD/YYYY

\*\*Mr. Cooper reviewed the account and found Notices of Payment Change (PCN) were not timely filed and/or delays in performing escrow analyses. A credit of \$4151.11 was applied to account for any untimely PCNs where payments increased resolve the escrow shortage. The account is current and due for the 06/01/2018 payment.

Creditor states that the debtors are not current on all postpetition payments consistent with § 1322 (b)(5) of the Bankruptcy Code, including all fees charges expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow and costs outstanding: + (b) \$ \_\_\_\_\_

c. Total. Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Debtor 1

Merle Allen Baker, Jr.  
First Name Middle Name

Last Name

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**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim**

*Check the appropriate box:*

- I am the creditor.
- I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**X** /s/Madison Wilson  
Signature

Date 04/04/2018

Print

Madison Wilson

First Name

Middle Name

Last Name

Title Authorized Agent

Company

RAS Citron, LLC

If different from the notice address listed on the proof of claim to which this response applies:

Address

130 Clinton Road, Suite 202

Number Street

Fairfield, NJ 07004

City

State

ZIP Code

Contact

973-575-0707

Email [mwilson@rasflaw.com](mailto:mwilson@rasflaw.com)

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on April 4, 2018, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

Daniel P. Foster  
Foster Law Offices  
PO Box 966  
Meadville, PA 16335

Merle Allen Baker, Jr.  
2040 Jackson Center Polk Road  
Polk, PA 16342

Trisha Marie Baker  
2040 Jackson Center Polk Road  
Polk, PA 16342

Ronda J. Winnecour  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219

Office of the United States Trustee  
Liberty Center.  
1001 Liberty Avenue, Suite 970  
Pittsburgh, PA 15222

RAS CITRON, LLC  
Authorized Agent for Secured Creditor  
130 Clinton Road, Suite 202  
Fairfield, NJ 07004  
Telephone: 973-575-0707  
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By: /s/ Madison Wilson  
Madison Wilson, Esquire  
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